

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SAFETY INSURANCE COMPANY)	CIVIL ACTION NO.
	05-10181-RWZ
Plaintiff)	
)
v.)	
)
UNITED STATES OF AMERICA)	
)
Defendant.)	
)

UNITED STATES MOTION FOR LEAVE TO SERVE SUMMONS AND COMPLAINT
UPON THIRD PARTY DEFENDANT

Pursuant to Rule 14 of the Federal Rules of Civil Procedure, the United States respectfully requests leave to serve summons and complaint upon William T. Fuller ("Fuller"), Safety Insurance Company's ("Plaintiff") insured, as a third party defendant.

In support the United States says:

1. While Fuller's, the Plaintiff's insured, negligent operation of his vehicle caused the collision that gave rise to this law suit, the Plaintiff seeks \$11,026.76 from the United State, which represents the costs Plaintiff had to pay to repair Fuller vehicle.

2. Moreover, a Department of Air Force vehicle, a 2002 Dodge, was totally destroyed in that collision, an approximate \$7,000 loss for the Air Force. Additionally, the Air Force paid another \$1160 medical costs for the injuries that resulted to the

driver of the Air Force's car. Therefore, the United States request leave to serve summons and complaint upon Fuller as a third party defendant.

WHEREFORE, for reasons more fully set forth in the accompanied Memorandum, the United States respectfully requests leave to serve a summons and complaint upon Fuller as a third party defendant.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

Dated: March 31, 2005

By: /s/ Christopher Alberto
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